DOCUMENT RESUME

ED 363 041 EC 302 497

TITLE	Comprehensive Action Plan for Reform.
INSTITUTION	New York State Education Dept., Albany. Office of Vocational and Educational Services for Individuals with Disabilities.
PUB DATE	93
NOTE	86p.
PUB TYPE	Reports - Descriptive (141)
EDRS PRICE	MF01/PC04 Plus Postage.
DESCRIPTORS	Agency Cooperation; *Delivery Systems; *Disabilities; Educational Needs; Employment Potential; Independent Living; Long Range Planning; Program Administration; Program Development; *Rehabilitation; *State Programs; *Vocational Rehabilitation
IDENTIFIERS	*New York

ABSTRACT

This document summarizes the plan of New York's Office of Vocational and Educational Services for Individuals with Disabilities (VESID) to reform its system of service delivery. It first describes activities begun in 1989 to improve the accessibility of vocational rehabilitation services to people with disabilities. The plan then details activities planned for the second phase of reform which focuses on the improvement of service delivery. These include identification of service priorities in the areas of integrated employment, improved consumer services, interagency activities, educational activities, fostering of independent living, and management development. Twenty-nine recommendations for change are proposed and presented in a tabular format, listing for each recommendation the reason for the proposed change, implications, and how the change may make a difference for the people VESID serves. Sample recommendations include: use business and industry for training; use business and industry as mentors; contract for development of new integrated employment opportunities; increase use of on the job training; implement a team approach to service delivery; develop a schedule of performance based reimbursement; consolidate contracts with service providers; establish a financial assistance methodology for persons attending vocational training programs; establish a coordinated transition system; expand use of community based assessments; develop a regional service planning model; and stress collaborative efforts. (DB)

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ED 363 041

The Office of Vocational and Educational Services for Individuals with Disabilities

VESID

COMPREHENSIVE ACTION PLAN FOR REFORM

U.S. DEPARTMENT OF EDUCATION
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VESID

COMPREHENSIVE ACTION PLAN FOR REFORM

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THE OFFICE OF VOCATIONAL AND EDUCATIONAL SERVICES FOR INDIVIDUALS WITH DISABILITIES (VESID)

COMPREHENSIVE ACTION PLAN FOR REFORM

EXECUTIVE SUMMARY

This *Comprehensive Action Plan* summarizes VESID's Plan to reform its system of service delivery. This Plan describes activities which began in 1989, under the first phase of reform, which improved the ease with which persons with disabilities access vocational rehabilitation services. The Plan then details activities planned for the second phase of reform to further improve the way in which services are provided to our consumers.

This reform effort is the continuation of a major evolutionary process that will result in the development of significant policies and strategies for reforming VESID's service delivery system. As the Reform effort proceeds, policies will be continually reviewed so that they will be responsive to the system as it develops. Under this structure, VESID will continuously evaluate and improve the way persons with disabilities are served.

The contents of the Comprehensive Action Plan for Reform represent the input and participation of nearly 1,000 people, including people with disabilities (current and former consumers), representatives of provider agencies, business and industry, organized labor, other State agencies, other Education Department offices, advocates for people with disabilities, the education community, and VESID staff. Additional public input was solicited over the last several months to refine recommended strategies prior to implementation. During the public comment period, 510 people provided comments. Individual comments were received on the plan in general and on the 29 proposed recommendations for change.

In addition to the plan itself, this document includes the compelling vision upon which the Reform effort is based, related policy changes resulting from the newly amended Rehabilitation Act of 1992, the impact of Chapter 515 of New York State Law and the policy directions of the State Interagency Council for Vocational Rehabilitation and Related Services, a description of the process by which recommendations for change were developed, the modifications made to recommendations based on public input, and next steps.

VISION FOR REFORM

The Office of Vocational and Educational Services for Individuals with Disabilities was created in 1989 by the reorganization of the Office of Vocational Rehabilitation (OVR) to fulfill a new, far reaching mission:

> *to provide the highest quality vocational rehabilitation and independent living services to all eligible persons as quickly as those services are required to enable such persons to live independent, self-directed lives.*

In addition to providing vocational rehabilitation services to people whose disabilities present barriers to employment, VESID is also charged with:

> *increasing access for all people with disabilities, regardless of age, minority status, or type of disability to the full range of services that are offered by the State Education Department; and coordinating lifelong educational services to persons with disabilities.*

In the past four years, VESID has accomplished a number of significant improvements.

- restructuring of VESID's Central Office; and implementing new staffing patterns in the District Offices;
- developing a common set of State policies regarding employment and related services through the State Interagency Council for

Vocational Rehabilitation and Related Services;

- changing VESID's philosophy and approach to access to services;
- establishing a leadership role in systemic change in New York State regarding transition from school to adult life;
- becoming the lead agency for integrated employment; and
- transferring Sheltered Employment role to the Office of Mental Retardation and Developmental Disabilities.

An outgrowth of these efforts has been a significant increase in the number of people with disabilities VESID serves on an annual basis. The number of persons who were referred to or sought services from VESID rose from 73,911 persons in Federal Fiscal Year (FFY) 1989 to 113,865 in FFY 1992, a 54 percent increase. VESID's service delivery system, however, is still very much like it was decades ago. As we listen to the people we serve, as we think about our reshaped mission, and as we look at the numbers of people in need of our services, it is clear that VESID's delivery system needs to be examined, brought up to date, and improved to effectively serve the increasing number of people with disabilities who require vocational rehabilitation services in New York State. Such a change is necessary to make the following vision of the future a reality.

Our vision is that in New York State:

- People with disabilities will come into VESID's offices knowing they are getting access to the highest quality services in this country; they will know that they will be treated with the greatest respect every time; and they will know they will be the primary decision makers about their plans and services.
- People with disabilities will have access to the best interagency collaboration, the most integrated employment system, the most accessible lifelong education system, and the most supportive set of independent living services.
- People with disabilities will have a wide range of choices as to where they can continue their education after high school and where they can receive additional training for jobs and careers.
- People with disabilities will be able to easily access all services provided or administered by the New York State Education Department.
- Families of people with disabilities will be able to get information quickly and easily about the transitions their children or young adults must make.
- People with disabilities will work in the community, as a rule, side by side with their neighbors.

It will take commitment, creativity, the willingness to think in new ways, and, most of all, teamwork to actualize this vision. VESID has joined with literally hundreds of consumers and people involved in serving people with disabilities to undertake a major initiative to move towards this vision. This activity will dramatically reform the way in which vocational rehabilitation services are provided. The initial product of this reform effort was captured in the draft *Comprehensive Action Plan for Reform*. The ideas presented in this Plan are recommendations that resulted from a yearlong process of review of VESID's services by people both directly and indirectly involved in the delivery system. These recommendations for change were further examined by the people who will be affected by these changes before final decisions were made.

Why all this? Why not just make ourselves more efficient and limit the number of people coming into our system? Because our job, our mission, is not to limit the number of people we serve but to supply the creativity, the intelligence and the energy it takes to serve all the people who require our services with the highest quality services. To meet this challenge, the continued involvement of consumers and others involved in serving people with disabilities will continue to be sought as we progress in this evolutionary process. Only through our collective efforts can we achieve this vision for the future.

RELATED ACTIVITIES THAT IMPACT ON THE REFORM PLAN

State Interagency Council for Vocational Rehabilitation and Related Services

As VESID has sought to reform its system of service delivery, related activities outside of the reform process have moved forward. These activities so profoundly affect the reform discussion that they will ultimately determine the outcomes of our discussions on several key issues.

For the past three years, the State Interagency Council for Vocational Rehabilitation has been developing interagency priorities and implementing policies for vocational rehabilitation and related services. In their first year, the members of the Interagency Council identified the following principles and operating guidelines:

1. Work is a valued activity, both for individuals and society.
2. All persons with disabilities are assumed to be capable of engaging in productive work, and should have the opportunity to do so.
3. Government should encourage people with disabilities to work in the most integrated setting possible in accordance with their needs and abilities.
4. Work should help each person with a disability meet personal growth, social and financial needs.
5. Government, business, industry, and organized labor should support and fund those services necessary to facilitate the ability of persons with disabilities to work.
6. Regulations and monitoring should reflect and promote the above work-related principles.

Rehabilitation Act Amendments of 1992 and Chapter 515 of New York State Law

During 1992, two major pieces of legislation significantly altered the way VESID will provide vocational rehabilitation services in New York State. On October 22, 1992, President Bush signed the Rehabilitation Act Amendments of 1992. These Amendments incorporate many of the progressive improvements in vocational rehabilitation and related services that New York State has implemented during the past three years. In most instances, the Rehabilitation Act Amendments were already anticipated in the reform process. As a result, many of the proposed Reform recommendations contained in the Plan are now required by the new 1992 Amendments. For example, the Amendments require that we:

- presume that an individual can benefit from vocational rehabilitation services, unless proven otherwise;
- rely on existing documentation and information available from the individual in determining eligibility and planning services;
- increase the involvement of the individual in the selection of services;
- provide assessments, services, and employment in the most integrated settings possible;
- develop formal cooperative agreements with other agencies that specify fiscal and program responsibility;
- improve the ability of business, industry, and labor to work in cooperative partnerships to improve the quality of vocational rehabilitation services and job and career opportunities for individuals with disabilities; and
- improve the ability of individuals with disabilities to live independently, enjoy self-determination, make choices, and pursue meaningful careers.

In addition, Chapter 515 of the Laws of New York State defined supported employment programs, established integrated training and placement as priorities for the vocational rehabilitation system and identified the State Education Department as the lead agency responsible for New York State's integrated employment programs. Chapter 515 focuses on integrated programs and services for persons with disabilities at a critical point in our reform. Reviews of

individuals in sheltered employment programs, undertaken in coordination with the Office of Mental Retardation and Developmental Disabilities over the past two years, have determined that as many as 40 percent of those persons included in the reviews could benefit from more integrated programs and services. One of the major impediments to them doing so is the lack of other options.

The directions established as a result of these activities are clear. Whatever decisions VESID makes regarding reform must be consistent with the principles and mandates of the State Interagency Council for Vocational Rehabilitation and Related Services, the Rehabilitation Act Amendments of 1992, and Chapter 515 of the Laws of New York State. These principles and mandates require that VESID's reform allow consumers the opportunity to fully participate in determining their programs and that these programs be offered in the most integrated settings possible.

PHASE I OF VESID REFORM: IMPROVING ACCESS TO SERVICES

VESID has been undergoing Reform since 1989. During this time, VESID began reforming its system by working towards the implementation of its revised mission. This initial stage of reform improved the way in which individuals with disabilities learn about and access VESID services. The following major changes and accomplishments occurred during this first phase:

Administrative Reorganization

VESID underwent a major reorganization of Central Office staff and assignments. This reorganization improved the organizational structure and resulted in the formulation of a revised mission, philosophy of services, and management principles to ensure that VESID staff incorporate basic philosophical principles into their everyday practices. These principles include respect for the dignity and potential of individuals, commitment to quality, promotion of options for learning and working alongside persons who do not have disabilities, active participation of those who use our services and elimination of unnecessary requirements for documentation. This reorganization also entailed VESID assuming responsibility for the overall coordination of lifelong issues related to serving people with disabilities both within the Education Department and on an interagency basis.

The State Interagency Council for Vocational Rehabilitation and Related Services

The State Interagency Council for Vocational Rehabilitation and Related Services was established to coordinate services among State agencies serving persons with disabilities. This Council increases service and employment opportunities for persons with disabilities through a coordinated service delivery system among these major State agencies.

Transfer of Supported Employment from the Office of Mental Retardation and Developmental Disabilities

VESID has assumed primary responsibility for the administration of the intensive phase of supported employment programs in New York State to increase integrated employment opportunities for individuals with severe disabilities who would not otherwise work in the competitive labor market. Simultaneously, the Office of Mental Retardation and Developmental Disabilities (OMRDD) assumed responsibility for the administration of the State's sheltered employment programs, including those that previously had been administered by VESID.

Access to Services Project

The Access to Services Project was implemented in 1991. This project improved the methods by which VESID accomplishes intake, establishes eligibility and involves consumers in the planning of services. This activity also resulted

in the development of a standardized case review process. This process served not only as a monitoring and quality assurance mechanism but also assisted VESID in identifying training needs and areas in which policy and procedures needed revision or clarification.

PHASE II OF VESID REFORM: IMPROVING SERVICE DELIVERY

Since January 1992, VESID staff and 956 consumers and external consultants have been actively involved in the second phase of VESID reform. In accordance with VESID's overall mission, Phase II Reform activities are aimed at providing the highest quality services to people with disabilities in New York State. This challenge comes at a critical time when a growing number of people with disabilities are in need of VESID services.

For the first time in a decade, over 100,000 persons were referred to or sought services from VESID in the last Federal Fiscal Year. On an annual basis, the number of persons VESID has contact with has increased by over 54 percent, from 73,911 consumers in Federal Fiscal Year (FFY) 1989 to 113,865 consumers in FFY 1992. VESID's consumers, advocates, providers, and employers have made it clear that VESID must transform the vocational rehabilitation system in New York State to address the growing demands on its system and improve the quality of services it provides.

Phase II of VESID's reform effort focused on improving VESID's service delivery system. It continued to follow the directions determined in the first phase of Reform. This approach was radically different from those of the past since the entire system of providing services was scrutinized. No traditions or existing systems were inviolate; all were subject to scrutiny as we work toward providing the highest quality services for people with disabilities in New York State.

THE OPERATIONAL STRUCTURE OF PHASE II REFORM

A Task Force of District and Central Office staff was appointed in May 1991 to review the current process of delivering vocational rehabilitation services. This Task Force identified aspects of the service delivery process that delay or impede individuals from becoming employed and prioritized areas of concern.

At the same time, from their perspectives as providers, referral agents, and partners in delivering services, the State Interagency Council for Vocational Rehabilitation and Related Services identified specific impediments facing individuals with disabilities as they attempt to enter employment.

Based on the information gleaned from the Task Force, the State Interagency Council, input from the field and VESID's experience during the previous year, VESID revised its priorities to more closely match its goal of improving service delivery. These revised priorities are:

1. **Integrated Employment**: VESID will increase the number of people in integrated employment placements.
2. **Improving Consumer Services**: VESID will improve and expand consumer services leading to vocational outcomes designed to meet the needs of persons with disabilities in such a manner as to encourage their full and independent participation in society. VESID will place special emphasis on ensuring the quality of such services.
3. **Interagency Activities**: VESID will ensure that services provided by the Department for persons with disabilities, of any age, are coordinated with other New York State agencies and will be integrated, nonduplicative, and comprehensive.
4. **Educational Activities**: VESID will work with the education community and all Offices of the Department to increase the utilization of programs and services under the auspices of the State Education Department by all persons with disabilities.

5. **Fostering Independent Living**: VESID will promote services and programs to enhance independent living for individuals with disabilities.

6. **Management Development**: VESID will improve the program and fiscal management of Office procedures and the allocation of resources across all of the priority areas.

A comprehensive structure was designed to address each of these priorities so that the quality and efficiency of VESID's service delivery would be enhanced. The structure was organized around the priorities identified with specific teams assigned to address each. A chart outlining this structure is provided on the next page.

To coordinate the overall activities of the priority teams, a coordination team composed of senior management staff of VESID and advisory staff from the Office of Advocate for the Disabled, the Commission on the Quality of Care for the Mentally Ill, and the Commission for the Blind and Visually Handicapped was established. The functions of the coordination team included:

- facilitation of communication among the priority teams,
- provision of technical assistance and guidance on issues,
- monitoring of progress against work plan objectives, and
- coordination of resources among the priority teams.

Each of the teams identified a Chairperson who served as a group leader. The Priority Teams was composed of both Central and District Office staff with the assistance of experts not employed by VESID. On an ongoing basis, the Regents Committee on Vocational and Educational Services for Individuals with Disabilities was kept informed of issues and recommendations as they developed.

Quality Management Approach

New York has undertaken a major initiative to implement Total Quality Management (TQM) in State government. The Education Department has joined several other State agencies in piloting TQM. Given the magnitude of this reform effort and the proven success of TQM as a framework for system improvement, VESID has chosen to make total quality management the process of Phase II. The philosophies and techniques of quality management provided guidance to VESID staff through this reform effort and established a system which allows for continuous improvement. Such techniques include the importance of developing a clear mission statement, defining the internal and external customer, establishing benchmarks, incorporating customer feedback, teamwork, continuing education and training, and establishing an environment for continuous improvement.

To implement this quality management approach, management staff worked with companies, such as IBM, Metropolitan Life, and Xerox, that have undertaken quality management initiatives which relate most closely to VESID's needs. In June 1992, VESID sponsored two workshops which were conducted by IBM for over 40 staff persons, including all members of the Reform Priority Teams. These sessions, which focused on "Transformational Leadership" and "Process Management," provided VESID staff with additional consumer directed strategies for the successful implementation of its reform.

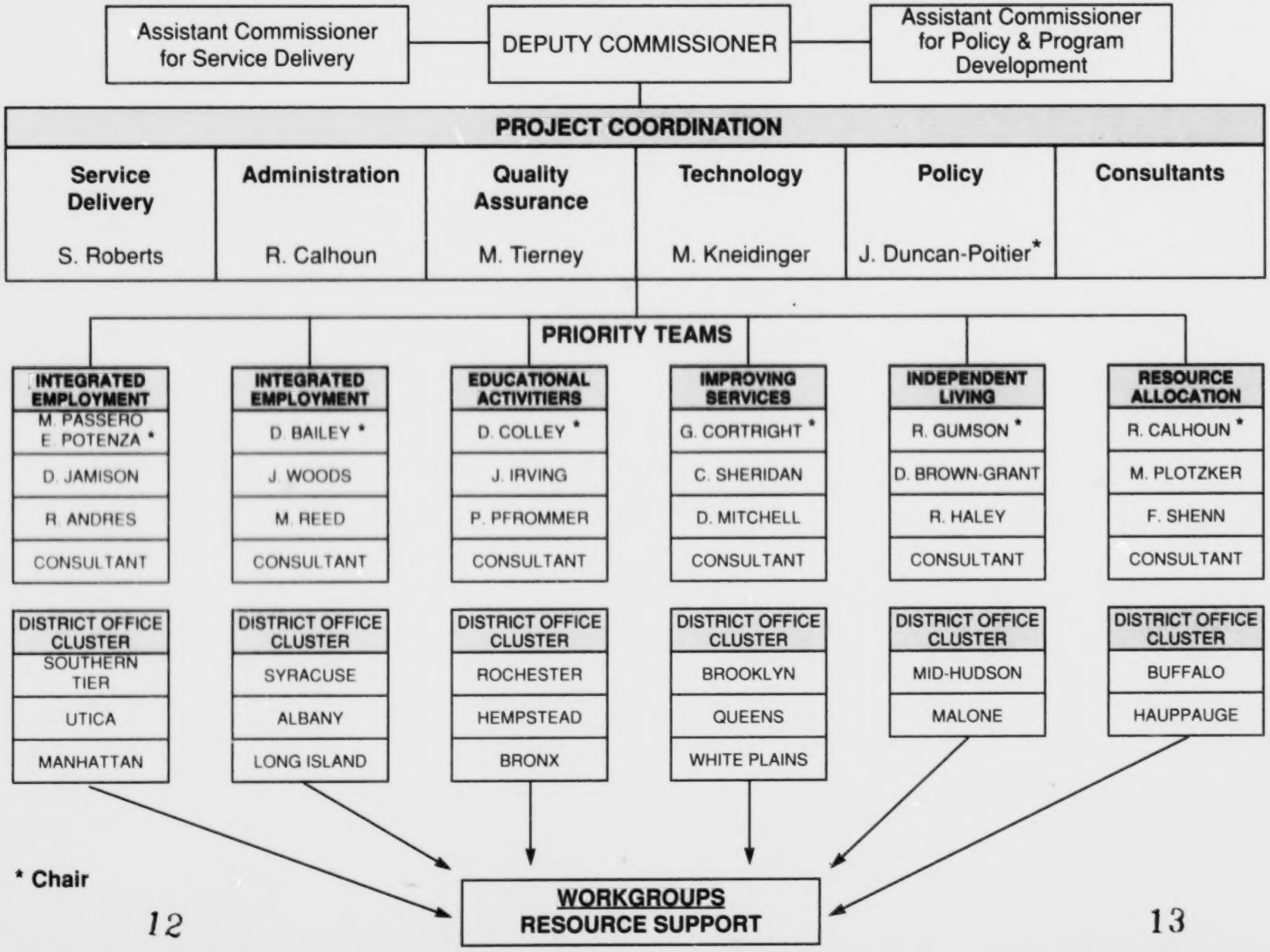
Consumer Involvement

Significant reform requires the meaningful involvement of persons who receive those services as well as individuals outside of our system who provide services. To ensure that current and former consumers were full participants in the development of preliminary recommendations for reforming VESID's service delivery system, a comprehensive process was created to regularly seek their input and incorporate their ideas on how to improve VESID's service delivery system.

Consumers were actively involved in each of the Priority Teams and participated in the development of preliminary recommendations for

VESID REFORM PHASE II

EXECUTIVE MANAGEMENT



* Chair

reforming VESID's service delivery system. During the initial period of Phase II, over 200 consumers were directly involved in this initiative.

During 1992, VESID also cosponsored forums with the State Interagency Council on Vocational Rehabilitation and Related Services to provide consumers with the opportunity to comment on how vocational rehabilitation and related services can be improved. Phase II's Coordination Team reviewed the recommendations shared during these forums to incorporate those ideas that related to the Reform activities.

Participation of Consultants

VESID openly invited and encouraged the involvement of key people from outside of its office to be active participants in the Reform process. People with disabilities and their parents, providers of services, educators, business leaders, representatives of advocacy groups, and other agencies were directly involved in each step of the process from the very beginning. Three hundred and sixty-six persons outside of VESID, representing organizations such as the AFL-CIO, Greater New York Automobile Dealers Association (GNYADA), the City University of New York (CUNY), the State University of New York (SUNY), Local Interagency Councils, Aging Out Task Forces, the Client Assistance Program (CAP), Commission for the Blind and Visually Handicapped (CBVH), Office of Mental Health (OMH), Office of Mental Retardation and Developmental Disabilities (OMRDD), Job Training Partnership Council, New York State Focus Group Subcommittees, College Consortia of Coordinators of Services for Students with Disabilities, and Independent Living Centers, were involved in the development of the draft recommendations.

Involvement of VESID Staff

In line with the quality approach, the Reform design also ensured that all staff were provided the opportunity to be involved in the process of developing ways to better serve VESID's consumers. In addition to involving many VESID staff members in each of the Priority Team activities, VESID regularly shared information on the Reform effort with all staff through information updates and regular notices of ongoing activities in VESID newsletters. These updates also provided a mechanism for staff feedback on the information shared.

In addition to the distribution of materials, formal orientation meetings were held in the Central Office of VESID and in each of the 15 District Offices throughout the State. These sessions, which occurred in November 1992, provided staff at all levels with a general update on the latest Reform activities and an opportunity to provide meaningful input.

PROCESS FOR ADDITIONAL INPUT

The recommendations and ideas contained in the Reform Plan were developed by the six Priority Teams created for the Reform process. These teams collectively had the direct involvement of nearly 1,000 people, including people with disabilities (current and former consumers), representatives from community rehabilitation agencies, business and industry, other State agencies, other Education Department offices, advocates for people with disabilities, the education community, and VESID staff.

VESID provided extensive opportunity for additional public input regarding the proposed plan since February 1993. The public comment process consisted of a mass mailing of over 3,000 copies of the proposed Reform Plan to consumers, rehabilitation facilities, professional organizations representing people with disabilities, advocacy groups, educational institutions, business and industry, organized labor, other State agencies, other Education Department offices, and VESID staff. Eight public comment meetings were also held statewide. These meetings, which were held in the Capital District, Long Island, Queens, Rochester, Western New York, the Southern Tier, and New York City, were publicized in local newspapers.

Comments were received from a broad range of professional organizations, higher education

professionals, other State agencies, private individuals, consumers, consumers' families, business, organizations which represent specific disability groups, organized labor, independent living centers, and rehabilitation facilities. Comments continued to be received after the deadline date. As of April 29, a total of 367 letters, including 168 form letters and petitions, or formal testimony was received. A total of 520 individuals provided comments on the recommendations for change.

Each of the letters or formal testimony received were carefully reviewed and categorized by individual recommendation to which a response was directed. No fewer than three comments were received on any one of the 29 recommendations while some of the recommendations received as many as 50 or more comments. VESID's determination to implement any of the proposed recommendations took into consideration all of the comments received. Several of the recommendations have been modified to incorporate many of these comments. In addition, the majority of implementation suggestions received were very helpful and will be used.

Since the beginning of the Reform process, some of the proposed Reform recommendations are now required by the new Rehabilitation Act Amendments of 1992. To comply with the law, all of those requirements will be integrated into VESID policy.

NEXT STEPS

In April 1993, VESID submitted to the Board of Regents an analysis of the public comments received on the Action Plan for Reform and VESID's response. In May 1993, the revised draft Plan was reviewed by the State Rehabilitation Advisory Council and the Statewide Independent Living Council. Following the Regents approval of the revised Action Plan for Reform in May, VESID will begin the implementation of the recommendations for change starting in June 1993.

ANALYSIS OF GENERAL COMMENTS RECEIVED ON THE ACTION PLAN FOR REFORM

In general, VESID received overwhelming support for the Reform Action Plan recommendations. This support was expressed not only for individual issues, but for the overall plan as well.

Fifty-two comments addressed the reform process itself. The following are examples of comments which focused on the accomplishments of the first Phase of reform.

> *"VESID should be congratulated for its extensive outreach activities....This outreach, as the numbers indicate, has been successful as well as courageous in the current economic times which have constrained state and national budgets...."*

> *"I would like to recognize some of the positive outcomes we ... have witnessed since the 1989 VESID reorganization. VESID has created a greater ease of access to their services. These services are more flexible in nature, more adaptable to individual needs and aspirations....For these improvements, we are grateful, and would like to recognize everyone associated with this positive change."*

> *"We would like to commend VESID for its efforts to date to reform its system of service delivery, and for the current plan to continue movement toward more person-centered and integrated services in New York State. Specifically, we support the vision that includes a focus on integrated employment, lifelong learning, supportive independent living services, and individual choice and access."*

Other comments complimented VESID for its efforts to reform the vocational rehabilitation system and the general direction of the reform recommendations:

> *"First I want to express my appreciation to ... VESID for this opportunity to comment and to praise what I believe is a strong initiative in transformational leadership."*

"After reading your Comprehensive Action Plan for Reform, I believe there is hope for me. After working in the workshop since graduation (I am now 34 years old) and seeing what sheltered workshops have to offer, this has been a waste of my time. Thank you for giving me a chance at a brighter future."

"... heartily endorses the Deputy Commissioner's "Vision For Reform" and his ambition to improve the service delivery system. That vision strongly reinforces the major themes of the 1992 Rehabilitation Act, particularly in its determination to insure that people with disabilities are getting access to the highest quality services, the most integrated employment system and a wide range of choices ...where they can receive additional training for jobs and careers."

"Let me commend the staff of VESID for drafting a plan that is clearly attempting to increase integration through the redirection of funding and services. Your recommendations for change in these areas are high-minded and timely. Additionally, they are consistent with the new paradigm of rehabilitation services, that is, programs that build on and support the Americans with Disabilities Act - a movement toward integration and independence.

"VESID is to be congratulated for the development of a plan which is clearly intended to transform the vocational delivery system to one that is more responsive to consumer needs and which encourages the integration of people with disabilities into the work world and other aspects of community life."

"You and the staff of VESID are to be congratulated for preparation of an exciting action plan — a plan for significant change in policy and practice affecting evaluation, vocational training and job placements."

"I am pleased that these documents build on the policy directions and accomplishments of the various intra- and interagency council work groups. Overall, OMRDD supports the direction expressed in these documents and is committed to working with SED and VESID to meet our mutual commitment to the families and citizens we serve."

"As co-chairperson of the Interagency Council for Vocational Rehabilitation and Related Services (ICVRRS), I am happy to see that many of the activities outlined in the VESID Comprehensive Action Plan for Reform reflect the implementation of priorities established by the ICVRRS."

"This is a truly progressive set of recommendations which advances significantly the pursuit of person centered, community centered employment services for people with disabilities in New York State. I am particularly impressed with VESID's stated vision which focuses on integrated employment, individual choice and access, life long learning, and supportive independent living."

"VESID is to be complimented not only for its development of this proposed action but for its leadership role in moving New York State toward the fulfillment of the vision articulated on page three. In particular, that 'people with disabilities will work in the community, as a rule, side by side with their neighbors' and that 'people with disabilities will have a wide range of choices as to where they can continue their education after high school and where they can receive additional training for jobs and careers.' We too, would like to see this vision of the future a reality."

Even though the majority of remarks on the Plan were complimentary, VESID also received a few criticisms of the document. Examples of these comments include:

"The recommendations need to be more detailed."

"It is hard to see specifics in this that will offset the numbers we are faced with, conflicting priority demands for our time."

"Data is not available at this time suggesting the programs proposed are effective. It is not reform until it is proven effective."

"Many of the proposed actions contained in the paper appear to be cost-cutting measures only and will not result in improved services."

"I think it is time that we all looked at a restructure that reduces the number of dollars spent on management."

VESID appreciates the supportive remarks that it received throughout this process. Nevertheless, it hopes to continually improve the ways in which we obtain consumer input in our activities. The criticisms received regarding this process will be considered as VESID continues to develop and improve its services.

MODIFIED RECOMMENDATIONS

The following pages contain the 29 recommendations for change. These final recommendations incorporate the input received during the public comment period.

INTEGRATED EMPLOYMENT OPPORTUNITIES

Priority Team members worked together to develop recommended actions for VESID to increase the number of people in integrated employment placements. In addition, this and other sections include recommendations to redirect limited resources to meet the growing and changing needs of VESID consumers more efficiently and effectively.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
1) Using Business and Industry for Training VESID's resources will be used to complement funds business and industry already invest in the training of new employees. This system should serve as a placement incentive to businesses and should reduce VESID's per placement cost of training. VESID will work with rehabilitation programs as partners to implement this recommendation.	VESID has established outreach to business and industry as a priority initiative to develop new training and placement options; however, sufficient resources have not been allocated for this initiative.	The impact should be significant if VESID is able to secure job training and placement directly through business in place of other sources.	This recommendation would enable VESID to extend its resources to additional consumers. This recommendation should also enable consumers to move through the system more quickly with a greater probability of successful placement upon completion of training.

Reason for Modification to Recommendation: VESID received a number of comments indicating the need for VESID to acknowledge and benefit from the years of experience rehabilitation programs have had in training people with disabilities. VESID agrees and will work with rehabilitation programs that sponsor successful training models with business and industry.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
2) Using Business and Industry for Job Referral/Placement Employers or business associations should be used to provide job referral/placement. Reimbursement to the employer/business associations will be based on a sliding scale (which will be dependent on the level of the job placement), and paid after 60 days of successful placement. Employer/business associations could designate an individual within the organization who would dedicate a set amount of time (e.g., 15 percent) per week to locating jobs for VESID consumers within their affiliates. VESID will work with several types of employers, including non-traditional industries, which offer employment at a variety of sites and career levels. The use of employers and business associations will augment, rather than replace, the role of private rehabilitation programs in placing individuals in jobs. VESID will work in partnership with rehabilitation programs to implement this recommendation.	The present system of contracting with providers does not allow for flexibility, or for the development of the large number of integrated employment options required to meet the needs of consumers. By devising ways to more creatively use employers as providers of referral and placement, VESID would increase the types of integrated employment placements available for VESID consumers, and ensure that these placements are more reflective of actual work place needs.	Vocational rehabilitation counselors would spend less time on referral and placement and could spend more time on counseling and planning. Employers would play an active role in creating job opportunities for workers with disabilities. Employers would also serve as a valuable resource in the provision of appropriate training that results in integrated placements.	Consumers would be given an opportunity for positions that they might not have access to otherwise. Jobs would be relevant to current labor market trends. The efforts and endorsement of the businesses, associations, and large employers would create opportunities in businesses that may have had little or no prior experience in hiring workers with disabilities.

Reason for Modification to Recommendation: Among the comments received on this recommendation were the strong suggestions that VESID carefully examine existing state models for integrated employment with rehabilitation programs that are successful and that VESID expand the types of industries participating in placement activities. VESID agrees and has modified the recommendation to reflect these suggestions.

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INTEGRATED EMPLOYMENT OPPORTUNITIES

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
3) Using Business and Industry as Mentors A region of the State will be targeted for development of up to six mentoring agreements with private, public, and not-for-profit employers including the manufacturing, retail/wholesale trades (general merchandising and food stores), health care and service industries.	Many VESID consumers seek direct entry to employment and do not require or desire formal skill training to prepare for entry into the local labor market. Many of these consumers do not require the level of support offered by supported or transitional employment programs, yet need some support during the processes of application, interview, and selection associated with entry level employment.	Direct placement into employment with mentoring services provides "work site" evaluation and work adjustment for VESID consumers who do not require formal skill training or are not considered appropriate for traditional sheltered or supported work programs.	Mentoring agreements would increase the number of integrated employment options for VESID. As training is received at the place of business, it is expected that a higher percentage of consumers would retain employment by participating in this model.
4) Expanding Integrated Employment Opportunities VESID will issue Requests For Proposals (RFPs) for rehabilitation programs to convert their sheltered employment programs to programs that develop jobs within local business communities and increase integrated employment opportunities. VESID will work in partnership with other State agencies and providers who have had successful	The Interagency Council has established the downsizing of sheltered employment programs as a major priority, with the focus on creating integrated employment opportunities, including affirmative businesses, in the community.	This would provide support for sheltered employment service providers to develop a more integrated service delivery model as appropriate.	This initiative would lead to increased integrated employment opportunities that are more relevant to the current business environment.

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Reason for Modification to Recommendation: VESID has renamed this recommendation to ensure that the intent of this planned action, which is to increase opportunities for employment in integrated settings, is clear. This recommendation has also been modified, based on input received, to acknowledge and benefit from the cooperative efforts of other State agencies.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
experiences in restructuring programs to place a greater emphasis on integrated employment.			
5) Contracts for Development of New Integrated Employment Opportunities VESID will establish contracts for rehabilitation programs to develop new integrated employment programs based on the work force needs of a particular region. Payment to the rehabilitation programs will be based on the successful placement of VESID consumers in integrated settings, including, but not limited to, Projects with Industry (PWI) models. This will be piloted with at least three programs.	The present system of contracting with providers does not allow for flexibility, or for the development of the large number of integrated employment options required to meet the needs of consumers.	Long term — Fiscal implications over the long term would be based on the success of the pilot programs and would depend on the amount of funds reallocated from other resources. This program would encourage creativity and flexibility on the part of service providers, enable VESID to tap into each agency's employer base, ensure that placements are more reflective of current labor market needs, and assist rehabilitation programs in creating new programs and markets for revenue.	VESID consumers could move more rapidly into competitive employment.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
6) Increased Use of On-the-Job Training (OJT) Establish an OJT Fast Track pilot in at least one selected District Office. For a given month of the year, all initial interviews will include a counselor determining consumer availability for and interest in the OJT Fast Track. Consumers identified through this process will begin OJT as soon as possible rather than after a lengthy plan development process or after other kinds of training programs have started. Identified consumers will be provided with Job Club services to prepare them for meeting with employers. Consideration will be given to issuance of a certificate of completion or other credential to trainee.	Of all training possibilities, the On-the-Job Training program has resulted in the highest number of successful placement outcomes for VESID consumers during the last three years. Currently, only a small number of VESID consumers participate in this program.	Consumers would have the opportunity to not only select employment goals, but also assist in the selection of the providers. Successful integrated employment outcomes would occur at an accelerated pace through this successful training model.	Consumers would obtain jobs more quickly and be more successful in their employment.

Note: Based on input received, VESID will, in the implementation of this recommendation, ensure that this training opportunity is not limited to persons with less severe disabilities. In addition, this recommendation now includes the option for VESID to expand the implementation of this recommendation to more than one District Office and the possibility of providing additional supports to consumers while they participate in training.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
7) Summer Employment On a pilot basis, VESID will seek summer employment experiences consistent with each college trainee's employment and higher education goals. Students will have the option of participating in paid or voluntary work experiences at several levels. Mentorships will be established with leading professionals in the community who will be asked to assist in structuring the sequence of summer internships for an individual throughout his/her higher education career. VESID will also continue to coordinate summer employment opportunities for youth with disabilities with existing programs funded under the Job Training Partnership Act (JTPA).	There is a need to increase the percentage of consumers who become employed following the completion of postsecondary training. College graduates do not always find timely employment following the conclusion of training nor is their wage and benefit structure commensurate with their education.	The provision of this employment work experience would result in additional persons with disabilities being better prepared to enter the labor force after completion of their postsecondary education.	In a labor market undergoing drastic shifts, there are many highly educated and experienced individuals competing with VESID graduates for employment. The provision of academic and career experiences would enhance consumers' ability upon graduation to compete more effectively with others in the professional labor force and secure more appropriate placement outcomes. Students would also have the opportunity to acquire appropriate work habits as well as identify whether their goals are consistent with their desires. This should also result in their enhanced satisfaction with placements at the end of their college careers.

Reason for Modification to Recommendation: This recommendation has been modified to clearly indicate that this summer employment experience would be *optional* to persons interested in benefiting from real work experience while pursuing a college education. Based on comments received during the review phase, this recommendation has also incorporated the suggestion to expand this opportunity to individuals in high school.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
8) Reintervention/Reentry to Vocational Rehabilitation Services VESID will revise its current reentry policy to ensure that consumers don't experience unnecessary delays in securing needed services. Reentry will be dependent upon a determination that the person meets Federal eligibility criteria, (and if there was a problem that led to the cessation of services, the problem has been addressed and the current situation has improved enough for the person to begin receiving services). The development of IWRP goals and objectives will reflect the need for intermittent reintervention whenever appropriate.	Currently, the process and criteria by which persons reenter the vocational rehabilitation system are inconsistently applied throughout the State.	Individuals who were previously VESID consumers and are currently unemployed or in danger of losing their jobs due to issues associated with their disabilities would be able to easily secure VESID services.	Eligible consumers in need of additional VESID services would receive such services without unnecessary delays.

Reason for Modification to Recommendation: This recommendation has been revised, based on input received, to omit the implication that cessation of services is caused by the person requiring services. It was never VESID's intent to place blame but rather to improve the way in which consumers access services.

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INTEGRATED EMPLOYMENT OPPORTUNITIES

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
9) Upgrading/Career Advancement VESID will develop a policy which will address upgrading and career advancement consistently throughout the State of New York. This policy will be consistent with the Rehabilitation Act Amendments of 1992 and the Federal regulations promulgated by the Rehabilitation Services Administration (RSA) related to this law.	VESID does not have a formal policy for consumers interested in receiving additional vocational rehabilitation services for career advancement.	Dependent upon the policy developed, there could be additional persons receiving VESID services.	People with disabilities who are working would have a clear understanding regarding the conditions under which VESID can help them advance in their careers.

Note: Based on input received, VESID will, in the implementation of this recommendation, define the term "upgrading" as the provision of advanced technology, additional training or other services that are necessary for an individual to maintain or advance in his or her job. In addition, VESID will look at other service models which promote career advancement such as Veterans Administration programs.

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IMPROVING OPERATIONAL AND FINANCIAL EFFICIENCY

The following recommendations were developed to improve the way in which vocational rehabilitation services are provided to VESID consumers. In addition, this and other sections include recommendations to redirect limited resources to meet the growing and changing needs of VESID consumers more efficiently and effectively.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
10) Team Approach VESID will develop a new and innovative method to provide the quantity and quality of services that VESID consumers require through a team approach. This team approach will be based upon the following principles and assumptions: A. Each team will have collective responsibility and accountability for fulfilling the mission of VESID, particularly with reference to attaining integrated employment outcomes. B. Consumers will be assigned one primary counselor to deal with counseling issues. C. Counselors will be responsible for decision making (including eligibility and plans of service) while counselor assistants would implement decisions.	The success of the access policies has increased a service demand which requires VESID to restructure its resources within the District Offices. A team approach is one way for counselors to better utilize their time for professional counseling services without the burden of other responsibilities (i.e., telephone followup, data entry, etc.).	Additional direct services could be provided to new consumers without the need for additional resources. The team approach may also improve communication among staff, enhance problem-solving capability, and result in continuous improvement in quality service delivery.	Consumers would receive counseling service without unnecessary delays. Individuals would have access to more people who are knowledgeable about and can respond to their needs. This team process would result in better solutions to consumer problems and more timely responses to consumers.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
make arrangements and provide professional support to counselors. D. Staff roles will be more flexible so that activities and tasks are handled by the most appropriate person. E. Community agencies will be incorporated into teams and will also be involved in referral and intake processes. F. Teams will maximize and promote the use of professional judgment by counselors and will also maximize the independence and autonomy of each team member to his or her maximum potential. G. Consumers will be informed on what to expect from the team. H. Open and frequent communication will be part of the team process, including regular team meetings and coordinated case conferencing. 36			37

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
I. Teams will be able to rely on other teams for specialized expertise; it is not expected that all teams will be able to handle all disability groups or be expert in all issues. J. Teams will be sufficiently small in order to promote group cohesiveness and coordination.			

Note: Based on public input received, VESID will, in the implementation of this recommendation, fully extend team membership to all persons who have a stake in the success of the individual's plan for service, including the consumer and his or her family and, if appropriate, service providers, other agencies, schools, and independent living centers.

VESID will also ensure that individuals are not overwhelmed by a team of staff. This will be done in at least two ways. First, a "primary counselor" will be assigned to provide a single, secure point of contact. Second, consumers will be fully oriented to the team approach and will be given the option of limiting their contact to the primary counselor if they choose. VESID may also call upon consumer advocates to assist an individual, if the individual so requests.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
11) Performance Based Reimbursement Develop a schedule of reimbursement for service provider agencies based upon factors such as the severity of disability of the population served, the quality of placement achieved, the rate of placement achieved and unique local conditions. Models will be piloted on a short-term basis using selected programs and some or all of the following criteria: ❑ types and severity of disabilities of individuals served and placed ❑ quality of placement achieved (i.e., salary and benefits) ❑ rate of placement achieved ❑ the percentage of individuals placed into integrated settings ❑ consumer satisfaction	More flexible payment schedules need to be developed which would provide incentives for service providers to develop more integrated employment opportunities.	VESID funds would be used more effectively, since they would support programs that lead to employment outcomes. Programs would be encouraged to create more integrated opportunities for consumers, and expedite job placement.	Consumers would move more quickly from referral to placement, and would obtain employment in competitive, integrated settings.

Reason for Modification to Recommendation: Many comments were received concerning the possibility of such a system creating incentives for providers to select persons with the least severe disabilities to achieve higher placement rates. Since the intent of this proposal is to give *all* consumers improved opportunities for successful placement, VESID agrees that it is necessary to provide specific outcome indicators for people with severe disabilities. This recommendation now includes service outcome measures and performance incentives in contracts which credit service providers for serving and placing persons with severe disabilities. VESID will also draw on the experience of other agencies.

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IMPROVING OPERATIONAL AND FINANCIAL EFFICIENCY

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
12) Economic Need Policy VESID's economic need policy will be applied in a consistent manner and expanded to include additional services, whenever appropriate, in order to develop a more equitable allocation of resources and to ensure that all people who are eligible and in need of services are served. VESID will conduct a study to determine the effect of applying economic need to other services allowed by Federal law.	There are certain services to which VESID does not currently apply economic need but could under Federal law. Under its existing policy, there are certain inconsistencies and circumstances where public funds are expended where consumer resources are available.	All consumers would be treated equitably. A policy would be developed that allows VESID to redirect resources to the provision of additional resources.	More new VESID consumers could be served on a more equitable basis.
Note: In implementing this recommendation, VESID will incorporate the suggestion that consumers and service providers participate in any study of economic need.			
13) Consolidation of Contracts VESID will consolidate contracts with providers of service wherever possible, bringing services such as supported employment into the same contract with training and placement services.	Services provided by many programs are authorized under separate contracts, thus requiring duplicative contract development activities with programs which have multiple contracts. Moreover, discrete contracts for services prevent flexibility in the use of funds to address the changing needs of consumers.	VESID and facility staff would have greater flexibility in the use of resources through combined contracts, which would enable the movement of resources from one category of service to another. Greater efficiency in contract development and oversight would occur if contracts were consolidated.	This would increase the opportunity for more consumer options and successful outcomes.
Note: Based on input received, VESID will, in the implementation of this recommendation, exclude the New York City contract which has already been consolidated.			

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
14) Medical and Social Services VESID policy will be revised to eliminate medically related services such as weight control and physical therapy. VESID will examine the current support system for child care services to determine whether these services could be eliminated or reduced. Since some of the services in this area are reimbursable by the Department of Social Services, VESID will aggressively pursue interagency agreements with this agency to ensure support for those services. VESID will also implement a waiver provision authorizing the payment of medical and social services in hardship cases, after all other potential sources of support have been exhausted. These waivers must include justification that such services are critical to the support of the consumer's vocational goal and must be approved by the District Office Manager or his/her designee.	VESID currently provides medically related or social services in support of consumers' vocational goals. Examples of these services include speech therapy, psychotherapy, weight control, physical therapy, and child care. Approximately $600,000 annually is spent on these services.	Funds currently being utilized for services which are currently available through other resources could be redirected to meet consumers' needs more efficiently.	There should be no negative effect on VESID consumers because alternative funding for these services would be available. VESID would be able to serve more people with disabilities by redirecting its resources to the provision of vocational rehabilitation services.

Reason for Modification to Recommendation: Although the philosophy supporting this recommendation is that the services under consideration are typically not specific vocational services and are often available through other sources, VESID recognizes that specific hardship situations exist. VESID has modified this proposal to include a waiver provision to allow the payment of medical and social services after all other potential sources of support have been exhausted and when unique circumstances make the provision of medical and social services critical to the support of the consumer's vocational objective.

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EDUCATIONAL LINKAGES

These recommendations will develop strong parallels between the vocational rehabilitation program and educational programs for students with disabilities. This includes those students who do not require special education services. The recommendations include steps to implement the Joint Agreement on the provision of Transition Services between the New York State Education Department Offices of Elementary, Middle and Secondary Education and VESID. In addition, this and other sections include recommendations to redirect limited resources to meet the growing and changing needs of VESID consumers more efficiently and effectively.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
15) Postsecondary Vocational Training VESID will establish a financial assistance methodology for persons attending vocational training programs which is comparable to the methodology applied for persons attending comparable college programs. This methodology will include tuition caps (with waiver provisions) so that persons attending trade and business schools will be reimbursed at the same levels as people attending comparable college programs.	VESID's financial support policy for business and trade schools is not consistent with college sponsorship. VESID policy places a cap on college tuition sponsorship but not on trade and business school training. As a result, VESID pays a substantially higher cost to sponsor consumers in programs at a trade or business school than in comparable programs offered at colleges. Some $6.2 million was spent on trade and business school training during the last State Fiscal Year. The average cost of sponsorship per consumer at a trade and business school was $2,844, while the average cost of tuition at a college program was $738 in the last State Fiscal Year.	Financial support for training would be redirected in a manner that is more efficient and equitable. Such a requirement would need to be phased in, allowing current vocational plans to run their course.	Decisions would be based exclusively on the programmatic needs of the individual.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
16) Higher Education: Graduate Programs VESID's resources will support individuals in graduate level study programs only when an undergraduate degree is insufficient to enter or retain employment. VESID will also provide support for graduate level study if the severity of an individual's disability limits his or her ability to simultaneously work and complete graduate level training required to reach his or her vocational goal. This recommendation will need to be phased in. Individuals currently in graduate programs will be allowed to complete those programs under existing IWRPs.	VESID should have consistent guidelines for determining when applicants require graduate level studies to reach their vocational goals.	VESID support for postsecondary education would be applied more equitably and effectively.	Consumers currently in graduate programs would not be affected. Future consumers would receive the support they require to attain their vocational goals. With the more efficient use of funds, services could be expanded in areas of greatest need.

Reason for Modification to Recommendation: Among the comments received on this recommendation was the concern for the needs of individuals with severe disabilities who might not be able to successfully pursue graduate level education without VESID's support. This recommendation has been modified to allow the provision of graduate level support to individuals if the severity of an individual's disability does not permit him/her to simultaneously work and pursue graduate level education required to reach his/her vocational goal.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
17) Coordinated Transition System A coordinated transition system which includes the elements of VESID's Joint Agreement with the Office of Elementary, Middle and Secondary Education (EMS) will be established. Changes in VESID's organizational structure, staffing patterns, and outcome measures will include: ❑ a central mechanism at the District Office level for telephone inquiries. ❑ counselors with school expertise to work in prereferral and postreferral aspects of the transition referral system. ❑ a system to account for student outcomes resulting from VESID's school transition involvement. ❑ a data base system to track referrals from individual school districts and to provide recommendations for in-school services. ❑ a standard vehicle to ensure consistent utilization of interagency councils.	There is a need for enhanced collaboration and systems change with schools to ensure employment, postsecondary education, and community living outcomes for youth with disabilities including those students who are not in special education. The need to establish collaborative relationships with schools to ensure effective linkages is now required by the Rehabilitation Act Amendments of 1992.	VESID staff and financial resources would be used more efficiently by supporting school districts in providing secondary students with appropriate training and placement services.	Every student who is eligible and requires vocational rehabilitation services would have an IWRP completed prior to leaving high school. Students with disabilities would benefit from adult expertise and linkages while they are in school. Many students would reach employment, postsecondary, and independent living outcomes without seeking adult services following graduation.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
(18) Transition Services VESID will work with the Office of Elementary, Middle and Secondary Education (EMS) to define which services school districts must provide under the Individuals with Disabilities Education Act (IDEA) and which services VESID must provide to secondary level students under the Rehabilitation Act Amendments of 1992.	Currently, VESID and school districts are able to fund the same services for secondary students. As a result, there is a need to clarify responsibility for vocational rehabilitation and transition services for secondary level students. The Rehabilitation Act Amendments of 1992 require transition services and joint agreements with education officials to facilitate transition.	VESID would be able to redirect its resources to more efficiently support the needs of secondary level students.	There would be no change for secondary level students who are currently receiving the transition and vocational rehabilitation services they require. Additional persons with disabilities would receive services as a result of the more efficient use of funds.
19) Higher Education VESID will work with the Office of Higher and Professional Education to define what supports are required for students attending higher education institutions and how such supports will be provided.	Students in higher education programs require additional supports and guidance to receive the full benefit of their postsecondary education.	Higher education programs would be able to provide the supports and accommodations necessary for their students with disabilities.	Additional students would be able to attend higher education programs.

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ASSESSMENTS

Priority Team members have developed recommendations in keeping with the Rehabilitation Act Amendments of 1992 and VESID's philosophy of limiting services to rely on existing information and the individual as a primary source of information in determining eligibility and service planning in the most integrated setting. In addition, this and other sections include recommendations to redirect limited resources to meet the growing and changing needs of VESID consumers more efficiently and effectively.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
20) Community-Based Assessments The use of comprehensive assessments, including situational assessment and other community-based assessments, will be expanded. "Community-based Rehabilitation Needs Assessment" means: placement and evaluation activities in real work sites in conjunction with the use of diagnostic tools in the most integrated setting possible. Examples include: ■ Direct arrangements with employers ■ Internships ■ Mentoring programs ■ Technical support with job coaches ■ Situational assessment arrangements	Current evaluation systems do not fully maximize integrated employment outcomes. Individuals with disabilities should have the opportunity for real work experiences as a part of an evaluation process. This assessment process should assess skills in real job settings and encourage more realistic experiences in determining employment goals. The Rehabilitation Act Amendments of 1992 have placed an emphasis on assessments in real job situations.	Community-based assessments would more accurately reflect the needs of consumers in integrated work settings. VESID could pay for these assessments through fee-for-service contract arrangements, other funding (JTPA, DSS) and/or by the reallocation of funds currently used for other forms of evaluation and training.	More consumers would receive evaluations that focus on real work experience which may result in more people moving into competitive employment.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
Implementation activities will include the following: ■ VESID, providers, and employers will establish parameters that address the practical implementation questions (e.g., transportation, supervision, liability, work requirements, wages, and evaluation); ■ Providers participating in this effort will be linked with VESID's business and industry initiatives; ■ Innovative funding methodologies will be tested; ■ Innovative arrangements with business as well as technical assistance, when needed, will be supported; and ■ Costs of providing these activities will be assessed so that cost-effective models can be developed.			

Reason for Modification to Recommendation: This recommendation was modified to respond to comments expressed regarding the system's capacity to identify the required employment options, VESID's ability to provide the necessary funding to implement this recommendation, and a number of implementation concerns.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
21) Diagnostic Vocational Evaluation Services (DVEs) VESID will begin a phased-in reduction in the maximum number of weeks authorized for DVEs. VESID will adopt a four-week DVE limit during the first phase of reduction. A three-week limit will become effective with the next phase of reduction. Exceptions to the maximum will be permitted only in unusual cases with the approval of the District Manager or his/her designee. Each evaluation will be based on the unique needs of the consumer. Policy will be clear that the maximum is not to be treated as the minimum. VESID will consider implementing, on a pilot basis, the regionalized evaluation proposals developed by a task group of rehabilitation providers.	There is a need to shift to new evaluation models which are directed towards placement opportunities in integrated settings. VESID must develop evaluations which are most beneficial to consumers and cost-effective. In most cases, consumers receive the maximum time allowed for DVEs regardless of individual needs.	For each week by which the actual duration of DVE services is reduced, there would be an approximate $2 million reduction in evaluation costs on an annual basis. These funds could be redirected to other services such as alternative evaluation models, restructuring of facility services toward more integrated employment or specific training and placement services with business and industry.	This change is likely to result in more efficient evaluation services at programs and move individuals through the system more quickly.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
VESID will also give rehabilitation programs the opportunity to propose to VESID, based on local need, how they would use redirected funds towards VESID's stated objective of increasing integrated employment opportunities. These proposals will also be reviewed with OMRDD.			

Reason for Modification to Recommendation: Based on the large number of comments regarding the potential loss of funding that could occur from the implementation of this recommendation, this plan of action has been modified to provide rehabilitation programs with the opportunity to use redirected funds towards integrated employment opportunities. Even though this redirection of resources may affect sheltered workshop funding, agencies will have the opportunity to continue to receive these funds, but for programs more aligned to the purposes that rehabilitation funds are intended to support. In addition, VESID will encourage rehabilitation programs to participate in other initiatives described in this Action Plan for Reform.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
22) Personal Adjustment Training Services (PAT) VESID will implement a phased-in reduction of the Personal Adjustment Training (PAT) service by setting the maximum number of weeks of service as follows. Service will be limited to 15 weeks per consumer. The implementation of this reduction will coincide with the start of new unified contracts during the reduction phase-in. In the subsequent contract year, the number of weeks authorized for PATs will be reduced to a maximum of 10 weeks. In the third contract year, the number of weeks authorized for PATs will be reduced to a maximum eight weeks' duration. VESID will examine the experience of the first year that this recommendation is implemented to determine if further modifications are appropriate. VESID will carefully examine the use of PATs for individuals with a vocational goal of sheltered employment. Policy will be made clear that the maximum number of weeks for a PAT is not to be treated as a minimum number of weeks. VESID will not authorize services that a	The cost benefit of purchasing these services in many situations is questioned. The aggregate cost of PATs is $7.2 million annually. This service is provided at rehabilitation programs and has typically led to sheltered employment. Currently, the maximum duration of this service is 26 weeks (two blocks of service of 13 weeks each). The average duration is 15 weeks. PAT often provides little more service to the consumer than an employee in a sheltered workshop receives.	For each week by which the duration of PAT service is reduced, there would be an approximate $500,000 reduction in cost on an annual basis. Funds could be redirected to other services leading to more integrated employment offered by programs now delivering PAT or other providers based on proposals approved by VESID.	This recommendation would allow VESID to redirect additional resources to serve additional persons with disabilities in New York State and move consumers through the delivery system to integrated placement opportunities more quickly.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
consumer does not need. Each case will be based upon consumer choice and the unique needs of the consumer. A waiver provision is included in this recommendation for persons with severe disabilities who require services beyond the time provided by the cap. This waiver provision will only permit exceptions to the maximum number of weeks authorized in unusual cases with the approval of the District Office Manager or his/her designee. VESID will also give rehabilitation programs the opportunity to propose to VESID, how they will use redirected funds towards VESID's stated objective of increasing integrated employment opportunities. These proposals will also be reviewed with OMRDD.			

Reason for Modification to Recommendation: The recommendation has been modified to clearly state that it is VESID's intent not to provide services that a consumer does not need and to provide services based upon consumer choice and unique needs. The recommendation has also been modified to incorporate a waiver provision for persons with severe disabilities in those instances where services beyond the standard cap are required. The third modification is a change in the number of weeks proposed for reduction of PATs from a minimum of 13 weeks to 15 weeks and the elimination of "blocks of service." This modification establishes the maximum number of weeks authorized for PATs by using the current average number of weeks for which PAT has been provided by rehabilitation programs.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves

Implementation will coincide with the start of new unified contracts during the reduction phase-in. This recommendation will further phase-in a reduction to a maximum of 10 weeks authorized for PATs during the second subsequent contract year and a reduction to a maximum of eight weeks in the third contract year. VESID will, however, examine the experience of the first year that this recommendation is phased in to determine if any further modifications are necessary for the second and third years. In addition, VESID policy will clearly state that the length of training services is to be based upon the unique needs of the consumer up to the maximum number of weeks in policy and that the maximum should not be treated as a minimum number of weeks.

The fourth modification includes an opportunity for rehabilitation programs to propose to VESID, based on local need, how they would use redirected funds towards VESID's stated objective of increasing integrated employment opportunities. This will allow rehabilitation programs to maintain a stable funding level while focusing on the development of greater integrated employment opportunities.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
23) Assessments for Vocational Planning VESID will secure more appropriate assessments for vocational planning by: A. Working with referring agencies to coordinate the assessment process and identifying specific information needed by VESID to determine eligibility and plan services. B. Developing rapid, focused assessments to respond to immediate job openings. C. Developing assessments in more integrated settings, especially for individuals who do not fit traditional assessment systems (e.g., persons with learning disabilities, persons seeking assessments in nonsegregated settings).	Currently, vocational planning services are often delayed because VESID authorizes evaluations that are often unnecessary and do not provide useful information for determining eligibility or planning services. Unnecessary evaluations also result in the use of valuable resources which could be redirected to areas of greatest need.	Appropriate assessments would result in clearer recommendations and directions for vocational planning. Resources for unnecessary assessment would be redirected to needed services. Referral sources would need further training on VESID assessment and eligibility requirements.	Assessments would be more individualized and more useful to consumers in identifying options and developing service plans. Consumers could begin services more quickly.

Note: Based on input received, VESID will, in the implementation of this recommendation, ensure that the type, duration, and location of assessments are appropriate to the person being assessed.

STATE AND REGIONAL PLANNING

These recommendations emphasize the importance of systematic planning for the effective use of resources and service provision. In addition, this and other sections include recommendations to redirect limited resources to meet the growing and changing needs of VESID consumers more efficiently and effectively.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
24) Regional Service Planning VESID will develop a regional planning model to: 1. reduce duplication of services; 2. increase the quality, efficiency, and effectiveness of services; and 3. focus on the needs and expectations of consumers and employers in the region. Regional Planning Councils will be appointed and include as participants: ■ individuals with disabilities and their families ■ VESID staff ■ independent living centers ■ business, industry, and unions ■ educational institutions ■ other agencies ■ providers of services ■ advocacy groups ■ community organizations	Service programs are often established in isolation from each other, resulting in duplication. Competing demands for service resources are not adequately addressed. Services are not always based on the needs of consumers or employers.	The reduction of duplicative services would allow VESID to redirect resources to serve additional consumers and develop new integrated employment opportunities. There would be a better match between programs and the needs of consumers and employers.	Individuals with disabilities would have a better understanding of the services available. Consumers would benefit from services designed to meet their needs. Through the involvement of employers, this planning model could lead to more direct job placements in integrated settings.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
Annual Regional Service Plan will: ■ define the region; ■ identify existing programs, their capacities, and their success rates; ■ forecast the needs of individuals with disabilities and employers in the region in the short-term and long-range future; and ■ identify program gaps and duplication.			

Note: In developing the actual planning process, VESID will look at alternative planning models as suggested by persons providing comments on the plan. Based on additional comments, VESID will also ensure that adequate consumer representation is included on each planning council; activities will be coordinated with existing planning models, as appropriate; variations for urban versus rural conditions will be built into the planning design; and VESID will also carefully evaluate the actual improvement in service quality and efficiency compared with the cost of operating the planning councils over time.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
25) Local Interagency System for Coordinated Services, Including Multidisciplinary Service Planning Coordinated interagency services will result in more effective and comprehensive service delivery. Development of a four-tier interagency system that enhances local individual and system planning will result in greater success on the job and in the community. The four tiers will consist of: 1. A VESID counselor and an interagency counterpart (e.g., mental health provider, case manager, etc.) working together with consumers on a comprehensive service plan; 2. An internal VESID District Office interagency committee to assist in the identification of issues and solutions;	Isolated service delivery is ineffective for individual consumers and costly for the systems involved.	Coordination with other agency systems would reduce duplication and overall costs thus allowing VESID to redirect its resources to serve more new consumers for integrated employment opportunities.	The provision of coordinated services would result in more effective and comprehensive services. This support system may result in greater consumer success on the job and in the community.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
3. A regional/county based Interagency Council to address systemic issues that affect the region or county's ability to provide appropriate services across systems; 4. The State Interagency Council for Vocational Rehabilitation and Related Services (ICVR) to assist the regional/county groups in addressing issues at the State or Federal levels. The existence of each of these tiers will be critical. The first involves the counselors and their interaction with other agency/provider counterparts in meeting the total needs of a consumer. The second level will include a process for local interagency issues to be resolved within any given District Office. These two areas focus on empowering counselors to make necessary decisions, and provide a mechanism to assure consistency across each District Office where interagency decision making is concerned. The third level will consist of a process for interaction on a			

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
regional/local basis with appropriate State and County agency staff to resolve issues identified by counselors, District Offices, and staff of other agencies. The fourth level will consist of working groups of the ICVR that will address issues deemed unresolvable on the regional level. In addition, these groups will address recommended solutions to problems or revisions in the system that emanate from regional groups.			

Note: Based on input received, VESID will work with other agencies to ensure that the process does not become cumbersome and expensive. The goal of this recommendation is to make service planning decisions at the level closest to the consumer of services. Coordination with other interagency and regional planning efforts will be assured.

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SERVICES FOR INDEPENDENT LIVING

The following are recommendations developed to improve the quality of independent living services to people with disabilities in New York State.

Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
26) Integration of Vocational Rehabilitation and Independent Living Services			
VESID will develop a uniform system for better incorporating independent living goals and services in planning and counseling activities.	Currently, no systematic approach is applied to assist VESID consumers in identifying their independent living service needs in reaching their vocational goals.	Independent living services would be better coordinated with vocational rehabilitation services.	A systemic approach to evaluating and meeting independent living needs would assist people with disabilities to live independently and participate fully in their communities.
Note: Based on input received, VESID will, when implementing this recommendation, involve the schools with independent living centers and will include independent living goals in Individualized Written Rehabilitation Plans, as appropriate.			
27) Standardized Referral			
A standardized referral process between District Offices and Independent Living Centers will be developed. District Office and Independent Living Center staff will be expected to meet periodically to plan how District Office and independent living services can be better coordinated.	Currently, the processes and criteria for VESID to refer consumers to Independent Living Centers (ILCs) and for ILCs to refer persons to VESID are inconsistently applied.	Standardized referral criteria and procedures would simplify and expedite both vocational rehabilitation and independent living services.	Individuals would receive the vocational rehabilitation and independent living services they require in a coordinated fashion.
Note: In response to public comments received, when implementing this recommendation, VESID will establish a standardized referral process with independent living centers, utilizing the New York State Interagency Council for Vocational Rehabilitation and Related Services referral form, to ensure that all persons referred to either program are fully informed and consent to the referral.			

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
28) Uniform System of Assessment VESID will coordinate the development of a uniform system of assessing independent living needs, as they relate to the attainment of vocational rehabilitation goals. A statement of the needs and how they will be met will then be incorporated into IWRPs, wherever appropriate.	Currently, no systematic method is applied to assist counselors and consumers in identifying independent living needs that relate to the attainment of the employment goals in the IWRP.	If VESID had a means of uniformly assessing independent living service needs, such needs could be incorporated into the IWRP, along with a statement of how such needs could be met. VESID would seek the assistance of Independent Living Centers in developing the uniform independent living needs assessment for VESID's vocational rehabilitation program. There would be no impact on the current assessment process for individuals seeking services from Independent Living Centers, since Centers provide services beyond those available through the vocational rehabilitation system.	Including independent living needs in the IWRP would ensure that the total needs of the consumer are considered and addressed in identifying consumer choices and meeting the individual's vocational goals.

Note: Based on input received, VESID and Independent Living Center representatives will work together to develop a set of criteria aimed at identifying potential independent living needs for VESID consumers. The criteria will be used by VESID staff working directly with consumers to establish independent living needs which may be incorporated into comprehensive individual service planning. The specific independent living needs identified could lead to referrals to community based Independent Living Service providers to work with the consumer and VESID in partnership toward achievement of employment goals.

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Recommendations for Change	Reason for Proposed Change	Implications	How Change May Make a Difference for the People VESID Serves
29) Collaborative Efforts VESID and ILCs will explore innovative ways of collaborating to serve and support individual consumers in achieving vocational rehabilitation and independent living goals. Collaborative arrangements will be based upon local and regional needs of consumers and resources. Innovative options, such as the collocation of staff and the development of local arrangements to foster greater integration of services, will also be considered.	The vocational rehabilitation and independent living systems provide access to a wide array of services to bring about greater consumer independence, productivity, and inclusion in their community. Both organizations can benefit from coordinated efforts so that information can be shared and joint strategies can be planned.	No fiscal resource implications would exist during this exploratory stage. Manager time will be necessary to establish a format for joint outreach. Staff time will be necessary to bring together a strategic plan of collaborative efforts.	Individuals with disabilities would benefit as a result of the coordinated delivery of vocational rehabilitation and independent living services. Access to both systems could occur in a manner that places little or no burden upon the individual in coordinating service delivery.

Reason for Modification to Recommendation: This recommendation has been modified to be more consumer focused rather than system focused.

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